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June 19, 2023

**VIA E-MAIL**  
**([mjalandoni@flannerygeorganis.com](mailto:mjalandoni@flannerygeorganis.com))**

Matthew L. Jalandoni, Esq.  
Flannery Georgalis LLC  
175 South Third Street, Suite 1060  
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Re: *Root, Inc., et al. v. Brinson Caleb Silver, et al.*

Dear Matt:

Thanks for your email this morning regarding discovery. While I do appreciate the situation you are in, your clients were ordered to fully respond to discovery on or before June 16, 2023. Indeed, that was the premise of the motion for extension your clients filed (ECF 112).

While I acknowledge timely receiving written responses, no documents were produced. And your message this morning indicating that your clients' "timeline on production is dependent on the Court's decision on the attorney fee motion" is not particularly comforting. This is especially true given that many of your clients' written responses refer to documents – documents that have not been (and I fear will never be) produced.

In addition, I believe many of the responses are incomplete and objections ill-founded. But I will leave that discussion for another day, after I review the documents produced by your clients.

I am happy to discuss this issue further with you in an attempt to resolve this impasse. Please produce the responsive documents this week otherwise I will involve the Court.

Very truly yours,

William D. Kloss Jr.

WDK/jlm

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